

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WISCONSIN

In the matter of:

In Bankruptcy No.: 18-12526

Donita Crow

Last 4 digits of SSN: 9768

Chapter 13

Debtors,

NOTICE OF OBJECTION TO MOTION OF WILMINGTON TRUST, NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY, BUT SOLELY AS TRUSTEE FOR MFRA TRUST 2015-1 FOR RELIEF FROM THE AUTOMATIC STAY

NOTICE OF OBJECTION

Please take notice, that the above Debtor, Donita Crow, through her attorney Matthew C. Lein of Lein Law Offices, has filed an Objection to the Motion of WILMINGTON TRUST, NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY, BUT SOLELY AS TRUSTEE FOR MFRA TRUST 2015-1 for Relief from Automatic Stay claiming in support of said objection as follows:

1. Movant claims that the above named debtor "is contractually due for the 6/11/18 payment and all amounts coming due since that date" and "[as] of 8/18/2018, the estimated default through and including 8/1/18 is \$3,195.68."(Movant's Br. P.1-2)
2. Debtor has made the following payments since 6/1/18:

Date	Amount Required Per Monthly Statement	Paid by D. Crow	Check #	Check Cashed
3/1/2018		1032.67	6081	Yes
4/1/2018		1032.67	6085	Yes
5/18/2018		772.25	6086	Yes
7/1/2018	879.96			
7/10/2018		879.96	6082	Yes
8/1/2018	3164.82			
8/11/2018	3420.66			
8/12/2018		1067.45	6083	Unknown
8/24/2018		1054.94	6087	No
8/24/2018		174.98	6088	Unknown
9/1/2018	3420.66			

3. Debtor is gathering more information at the moment and will provide a supplemental accounting when more information is received.

Conclusion

WHEREFORE, Debtor requests:

1. Motion of WILMINGTON TRUST, NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY, BUT SOLELY AS TRUSTEE FOR MFRA TRUST 2015-1 for relief from Stay is overruled.

Date: September 4, 2018

Electronically signed by Matthew C. Lein

Matthew C. Lein, 1084028

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